IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Marisa Catota, individually and	§	
ON BEHALF OF ALL OTHERS SIMILARLY	§	
SITUATED,	§	
Plaintiff	§	
	§	
V	§	CIVIL ACTION NO. 4:23-cv-3187
	§	
TIERRA VIVA, INC., AND	§	
EDUARDO LOPEZ, INDIVIDUALLY.	§	
Defendants	§	
	§	

UNOPPOSED MOTION TO EXTEND ANSWER DEADLINE

Under Rule 6(b), Defendants Tierra Viva, Inc. and Eduardo Lopez, individually, respectfully requests an extension of their answer deadline. Defendants' answer is currently due on September 25, 2023. Fed R. Civ. P. 12(a).

Plaintiff is unopposed to Defendants' first request for a 30-day extension of time to file the answer, making Wednesday, October 25, 2023, the new answer deadline.

The request is necessary because counsel for Defendants already has a deposition scheduled for September 25, 2023 and also has multiple other deadlines that prevent him from fully preparing an answer by the current deadline. Defendants retained Mr. Chavez only yesterday, September 25, 2023. Defendants' counsel believes this case can be resolved very soon without further litigation.

For the foregoing reasons, Defendants content good cause exists to revise the deadline.

Considering counsel's other commitments and deadlines, the proposed extension will provide adequate time to prepare the answer.

Request for Relief

Defendants respectfully requests that the Court extend the deadline to file an answer to Plaintiff's Original Complaint to October 25, 2023. Defendants respectfully pray further for all other relief to which they may be justly entitled under law and equity.

Respectfully Submitted,

KEVIN M. CHAVEZ, PLLC

/s/Kevin M. Chavez
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DEFENDANTS

CERTIFICATE OF SERVICE AND CONFERENCE

I certify that on September 21, 2023, a copy of the foregoing pleading was served on all counsel of record via the Court's ECF system. I further certify that Counsel for Plaintiff is unopposed to the relief requested, stating so in a phone call and email on September 21, 2023

/s/ Kevin M. Chavez
Kevin M. Chavez